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Attorneys for Plaintiff MyOutDesk, LLC

Attorneys for Defendants

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

MYOUTDESK, LLC.,

Plaintiff,

vs.

MOD ASSISTANTS, LLC a Texas limited
liability company, MOD ASSISTANTS, LLC
a Colorado limited liability company,

Defendants.

Case No. 2:25-cv-01942-CKD

Honorable Carolyn K. Delaney

**STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
COMPLAINT**

1 Pursuant to Civil Local Rule 144, Plaintiff MyOutDesk, LLC (“MyOutDesk”) and
2 Defendants MOD Assistants, LLC, a Texas limited liability company, and MOD Assistants, LLC,
3 a Colorado limited liability company (collectively, “Defendants”), by and through their counsel of
4 record, hereby stipulate as follows:

5 WHEREAS, on July 9, 2025, MyOutDesk filed a Complaint against Defendants;

6 WHEREAS, currently, Defendants response to the Complaint is due September 15, 2025;

7 WHEREAS, Defendants recently engaged lead counsel for this matter and will benefit
8 from additional time to respond to the Complaint;

9 WHEREAS, the parties have conferred about, and agreed to, a proposed October 13, 2025
10 extension to the current deadline for Defendants to respond to the Complaint;

11 WHEREAS, by entering into this stipulation, Defendants are not waiving any jurisdictional
12 arguments or arguments as to proper venue;

13 WHEREAS, this is the second request for an extension in this matter; the first extension,
14 for 13 days and pursuant to Local Rule 144(a), was between MyOutDesk and MOD Assistants, a
15 Texas limited liability company, to ensure that its deadline to respond to the Complaint was the
16 same as that for MOD Assistants, a Colorado limited liability company;

17 WHEREAS, the parties agree that good cause exists to modify the schedule for Defendants
18 response to the Complaint and that the extension is not sought for delay or improper purposes;

19 WHEREAS, the parties intend to avail themselves of Civil Local Rule 144(a) to the
20 maximum extent possible to extend Defendants’ time to respond to the Complaint, but the parties
21 recognize that, given the prior stipulation, leave of Court may be required to extend the time for
22 MOD Assistants, LLC, a Texas liability company, to respond to the Complaint beyond September
23 30, 2025, and thereby respectfully request a Court order to effectuate the full length of the parties’
24 intended stipulation;

25 NOW THEREFORE, the parties stipulate and agree, and respectfully request the Court
26 order, that Defendants shall have up to and including October 13, 2025 to answer or respond to the
27 Complaint.

28 IT IS SO STIPULATED.

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DATED: September 11, 2025

VERSO LAW GROUP LLP

By /s/ Kourtney Speer (as authorized on 9/11/2025)
Kourtney Speer
Attorneys for Plaintiff

DATED: September 11, 2025

QUINN EMANUEL URQUHART
& SULLIVAN, LLP

By /s/ Andrew M. Mather
Andrew M. Mather
Attorneys for Defendants

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

1. Defendants shall have until October 13, 2025 to answer or respond to the Complaint.

Dated: September 13, 2025



CAROLYN K. DELANEY
UNITED STATES MAGISTRATE JUDGE